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11	UNITED STATES DISTRICT COURT	
12	DISTRICT OF NEVADA	
13	PlayUp, Inc., a Delaware corporation,	Case No. 2:21-cv-02129-GMN-NJK
15	Plaintiff,	
16	v.	STIPULATION TO EXTEND
17	Dr. Laila Mintas, an individual,	DEADLINE TO FILE JOINT PRETRIAL ORDER
18	Defendant.	(SECOND REQUEST)
19	Dr. Laila Mintas, an individual,	
20	Counterclaimant,	
21	v.	
22	PlayUp, Inc., a Delaware corporation; PlayUp Ltd., an Australian company; Daniel Simic, an	
23	individual,	
24	Counterdefendants.	
25		_
26	Counterdefendants PlayUp, Inc. and Dani	el Simic and Counterclaimant Dr. Laila Mintas, by
27	and through their undersigned counsel of record, hereby stipulate and agree to extend the time to file	
28	a Joint Pretrial Order from to May 12, 2025 to Ju	ne 11, 2025. This is the parties' second request for
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an extension.

Per the Court's Order dated April 21, 2025 [ECF No. 638], the parties have until May 12, 2025 to file a proposed Joint Pretrial Order. The parties are seeking additional time to do so, for several reasons. First, there is an in-person hearing on May 9, 2025 on Dr. Mintas's Amended Second Renewed Motion to Compel Forensic Examination [ECF No. 627], which may affect the evidence and issues of fact/law raised in the JPTO. Second, the discovery in this matter has been extensive, with much of it involving out of state (and foreign) witnesses who may not appear at trial. Preparing the required proposed deposition excerpts for 10-13 witnesses (along with objections and/or counter designations) has proven to be time-consuming, with many of the transcripts reflecting full day depositions. Finally, there have been eleven disclosures of documents by Counterdefendant PlayUp, Inc. and thirty-one disclosures by Counterclaimant Laila Mintas, resulting in a significant number of documents that the parties are working to include in exhibit lists with the proper objections. The parties understand that the Joint Pretrial Order is not a "catch-all" in which to include every disclosed document and every disclosed witness, and are working to prepare an order that complies with the Court's expectations.

Further, the parties have requested 30 days instead of a shorter period due to a planned out of office period for Counterclaimant's counsel<sup>1</sup> that is preparing the JPTO. The time period should not adversely impact the matter, which is currently set for a settlement conference on August 27, 2025.

This stipulation is submitted in compliance with LR IA 6-1(a). Good cause exists for the requested extension, as set forth above. As this stipulation was not submitted 21 days before the deadline originally provided in the parties' scheduling order, excusable neglect may need to be shown. If that is the case, the parties have been working cooperatively on completing their segments of the JPTO, but realized that they would not be able to exchange their segments and prepare objections, counter designations and responsive issues of fact and law by the deadline. Accordingly, the parties

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<sup>1</sup> May 15-22.

1	agree that the requested extension furthers the interest of this litigation and is not being requested in	
2	bad faith or to delay these proceedings unnecessarily, and request that the Court grant the extension	
3	from May 12, 2025 to June 11, 2025.	
4	DATED this 6th day of May, 2025. DATED this 6th day of May, 2025.	
5	Dry /a/ Shari M. Thomas Dry /a/ Amanda I. Drookhyaan	
6	By: /s/ Sheri M. Thome Sheri M. Thome, Esq. Nevada Bar No. 008657 By: /s/ Amanda J. Brookhyser Amanda J. Brookhyser, Esq. Nevada Bar No. 011526	
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9	Telephone: 702.727.1400 Email: Sheri.Thome@wilsonelser.com  Attorneys for PlayUp Inc. and Daniel Simic	
10	Attorneys for Dr. Laila Mintas	
11		
12	<u>ORDER</u>	
13	GOOD CAUSE SHOWN, IT IS SO ORDERED. The deadline for the parties to file a	
14	proposed joint pretrial order shall be extended from May 12, 2025 to June 11, 2025.	
15 16	alle	
17	UNITED STATES DISTRICT JUDGE	
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19	DATED:	
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